

SEIDEN | LAW

VIA ECF

Hon. Victor Marrero
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

June 2, 2023

Re: *Baliga, et al. v. Link Motion Inc., et al.*, 1:18-cv-11642-VM-VF (S.D.N.Y.)

Dear Judge Marrero,

We write on behalf of Robert Seiden in his capacity as the Court-appointed temporary receiver (“Receiver”) over Link Motion Inc. in response to the letter (ECF 431) submitted to the Court earlier today by counsel to defendant Vincent Wenyong Shi’s (“Shi”). Shi’s request for leave to submit a reply brief should be denied. It was Shi’s burden to come forward with evidence to support his entitlement to injunctive relief, and (for the reasons demonstrated in the Receiver’s opposition papers, *see* ECF 428-430) Shi failed to do so. No reply is needed. Shi’s request for leave to submit a reply *in two weeks* further confirms that there is, in fact, no “emergency.” Rather, Shi’s injunctive motion is merely another improper attempt to delay the extraordinary general meetings (“EGMs”) that were authorized by this Court. The Court should deny Shi’s motion and permit the EGMs to proceed without further delay.¹

Respectfully submitted,

/s/ *Amiad Kushner*

Amiad Kushner

Counsel for the Receiver

¹ To the extent that Shi has any objections to Mr. Guo’s expenses, those issues may be addressed as part of the accounting that Shi requested and that has already been ordered by the Court.